



**U.S. Department of Justice**  
Criminal Division

May 16, 2019

**William D. Massey, Esquire**

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**RE: *United States v. Alexander Alperovich, M.D.***

CR. No. 19-cr-10040-JDB

Counsel:

This letter is in response to your letter for discovery which was received by our office. Pursuant to your discovery request, the United States has enclosed the following in accordance with Rule 16 of the Federal Rules of Criminal Procedures:

Materials enclosed include documents numbered DOJ\_PREVENTAGENIX-0000151389 - DOJ\_PREVAGENTIX-010612650. These documents have been made available for you to download via USAfx.

All evidence is available to be tested, copied, inspected, or photographed as often as necessary at a mutually convenient time. Please contact me to arrange a time for access to this evidence. If any page, or item listed is not included with this letter, please contact me so that I can provide you with the document.

I am unaware of any exculpatory evidence at this time. However, if I become aware of any such evidence I will contact you immediately.

Feel free to contact me at your convenience so that we can discuss any further discovery matters. Any effort to settle this case needs to be completed prior to the hearing of any motions you may file. If you have any questions, please call me.

Based upon your request for discovery, I, in turn hereby request any reciprocal discovery you may have that is provided by Rule 16(b), Fed.R.Crim.P. Additionally, pursuant to Fed.R.Crim.P. 12.1, the government requests that the defendant notify the attorney for the government in this cause of any intended alibi defense.

Respectfully,

s/Andrew Pennebaker

Andrew Pennebaker

Trial Attorney

Criminal Division, Fraud Section

U.S. Department of Justice

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